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U.S. DISTRICT COURT  
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DISTRICT OF UTAH  
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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LARON THOMAS ZAUGG,

Defendant.

INDICTMENT

18 U.S.C. §§ 2252A(a)(3)(B) and (b),  
ADVERTISING CHILD  
PORNOGRAPHY (Count I);  
18 U.S.C. §§ 2252A(a)(2) and (b),  
RECEIPT OF CHILD PORNOGRAPHY  
(Count II).

The Grand Jury Charges:

**COUNT I**

Advertising Child Pornography  
(18 U.S.C. §§ 2252A(a)(3)(B) and (b))

Beginning on or about August 26, 2014, and continuing until on or about August 27, 2014 in the Northern Division of the District of Utah and elsewhere,

LARON THOMAS ZAUGG,

defendant herein, did knowingly advertise, promote, present, distribute, and solicit through the mails, and in interstate and foreign commerce by any means, including by computer, any material and purported material in a manner that reflects the belief, and that is intended to cause another to believe, that the material and purported material is,

and contains an obscene visual depiction of a minor engaging in sexually explicit conduct, and a visual depiction of an actual minor engaging in sexually explicit conduct, and attempted to do so; all in violation of 18 U.S.C. §§ 2252A(a)(3)(B) and (b).

## COUNT II

Receipt of Child Pornography  
(18 U.S.C. §§ 2252A(a)(2) and (b))

Beginning on or about August 26, 2014, and continuing through on or about December 5, 2014, in the Northern Division of the District of Utah,

LARON THOMAS ZAUGG,

defendant herein, did knowingly receive any child pornography, as defined in 18 U.S.C. § 2256(8) that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so; all in violation of 18 U.S.C. §§ 2252A(a)(2) and (b).

A TRUE BILL:

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FOREPERSON OF GRAND JURY

CARLIE CHRISTENSEN  
United States Attorney

CAROL A. DAIN  
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